



ALEXIS BRESHERS, SGT

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

WILLIAM RAY SPRAY, JR., and)
RHONDA JEAN SPRAY, Individually)
and as Personal Representatives)
of the ESTATE OF SINDI LUCILLE)
SPRAY, Deceased,)

Plaintiff(s),)

-vs-)

Case No. CIV-20-1252-C

BOARD OF COUNTY COMMISSIONERS)
OF OKLAHOMA COUNTY, in its)
Official Capacity as Governing)
Body of the County of Oklahoma)
County,)

Defendant(s).)

DEPOSITION OF ALEXIS BRESHERS, SGT

TAKEN ON BEHALF OF THE PLAINTIFF(S)

IN OKLAHOMA CITY, OKLAHOMA

ON SEPTEMBER 16, 2022

REPORTED BY: LESLIE A. FOSTER, RPR

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1 mean that whoever wrote this says that sight checks were
2 completed on 50 cells in three minutes?

3 A Yes.

4 Q How many people are used to do sight checks at
5 one time?

6 A One.

7 Q One person, not 50 people, but one person.
8 Right?

9 A Yes.

10 Q And have you ever conducted a 1-50 sight check
11 yourself?

12 A Yes.

13 Q Have you ever done it in three minutes?

14 A It usually takes me about five to six.

15 Q When you do a sight check, what is it that you
16 actually do?

17 A You look in the window and check for movement
18 or life.

19 Q And when you do that, do you take any notes?

20 A No.

21 Q If you see anything that you consider to be
22 unusual, do you make a record of it?

23 A You can.

24 Q And I should ask it this way. Are you
25 instructed -- strike that.

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1 there's four other entries down here or four other
2 initials. Do you recognize who that is?

3 A No.

4 Q When you conduct a sight check to look into the
5 window through the door -- right?

6 A Yes.

7 Q When you do that and you're looking through
8 there, how long do you look in each window?

9 A It varies. Like, if you can see the inmates
10 clearly up and moving, then you're going to not stay at
11 that cell as long as somebody that's sleeping.

12 Q If somebody's sleeping, how long do you look?

13 A Until you see movement.

14 Q What if -- what if they're just asleep --

15 A Or breathing.

16 Q -- and not moving? Are you able to see that
17 from the door, see their chest moving?

18 A Yes.

19 Q Did they train you to do that?

20 A We're taught to look for life.

21 Q And were you taught what to look for when
22 you're trying to look for life?

23 A Yes.

24 Q What were you taught to look for?

25 A Movement or breathing, like, the chest going up

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1 and down.

2 Q And did they teach you how to do the looking?
3 Did they teach you how to look for the chest movement?

4 A No. Just look in the cell.

5 Q And if they're asleep, do they ever have covers
6 on?

7 A Yes.

8 Q What do you do if they're asleep and they have
9 covers on? Do you go in there and check them?

10 A You can.

11 Q I know you can, but do you? Is that a regular
12 thing?

13 A If somebody looked suspicious or had concern,
14 then, yes.

15 Q Okay. If you just see people that are laying
16 down and they're covered and they look like they're
17 sleeping, do you go in?

18 A No. If I can -- if I can tell that they're
19 okay, then I don't.

20 Q What if they're just not moving?

21 A Then I would go in.

22 Q And --

23 A And say their name and get a response verbally.

24 Q And these sight checks that take -- where it
25 says 50 of them in three minutes, number one, you have to

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1 A Just tactical moves for different situations.

2 Q Was it for defensive purposes?

3 A Yes.

4 Q Did you successfully complete the academy?

5 A Yes.

6 Q During the academy, were you trained in any way
7 regarding emergency care of patient -- of residents?

8 A Just CPR.

9 Q Had you ever been trained on that, in CPR,
10 before? Before the academy.

11 A Yes. Because --

12 Q Where at?

13 A Childtime.

14 Q I misunderstood.

15 A Childtime, the day care.

16 Q The day care, yes. Was there any other type of
17 life-saving training that was provided at the jail other
18 than CPR?

19 A If somebody's choking.

20 Q What were you trained to do?

21 A How to do the Heimlich.

22 Q Were you given specific training in anything
23 regarding persons who are users of opioids or heroin or
24 anything -- any of those type of drugs?

25 A No.

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1 Q Were you given any specific type of training
2 regarding the symptoms, physical symptoms, of what can
3 happen to a person who is addicted to heroin or other
4 opioid type of drugs?

5 A No.

6 Q Were you given any specific training on what to
7 look for regarding a person who has been chronically
8 addicted to opioids, heroin, those type of drugs -- and
9 what I'm asking is if they taught you what to look for
10 when a person is going through detox?

11 A No.

12 Q Have you ever to this day been trained on how
13 to deal with a drug addict who's going through detox?

14 A No.

15 Q My question was very broad, but specifically,
16 you were never trained at the Oklahoma County Jail
17 regarding that, were you?

18 A No.

19 Q To this day, have you learned from any
20 source -- the jail or anywhere else -- what kind of
21 things can be expected to happen to a person who's
22 detoxing from heroin or other opioid drugs?

23 A Just by escorting the nurses to listen to the
24 conversations.

25 Q I'm talking about specific training.

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1 Did you take her to the clinic?

2 A No.

3 Q But you brought her back?

4 A Yes.

5 Q Can you tell us approximately when that was?
6 And if there's any records that you to need to look at,
7 I'll pull them out for you.

8 A I want to say it was that morning. It was
9 before noon.

10 Q Okay. When you saw in -- I think it was in
11 Exhibit 4 where it says that she went to the clinic for
12 treatment at -- I think it says 8:52, something in that
13 time range.

14 A Yes.

15 Q Are you thinking you brought her back from the
16 clinic that morning?

17 A Yes.

18 Q I don't think -- strike that.

19 We talked about this a little bit earlier. I
20 don't think we saw an entry in the logs about you or
21 anybody else bringing her back. Is that correct?

22 A That's correct.

23 Q But you were the person that brought her back?

24 A Yes.

25 Q On that occasion when you went to bring her

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1 back, I'm going to ask you to tell us in as much detail
2 as possible how you were called or told to go get her.

3 A I was just told that I have an inmate complete
4 in the clinic.

5 Q Do you know how that would have been
6 communicated to you?

7 A "Sixth-floor rover, you have an inmate complete
8 in the clinic."

9 Q Were you the sixth floor rover?

10 A Yes.

11 Q But who told you?

12 A A medical --

13 Q I'm just trying to find out how it gets
14 communicated to you.

15 A The person working the clinic.

16 Q So somebody from the clinic contacted you?

17 A Yes.

18 Q Okay. I'm doing some assuming here, and I'd
19 like for you to tell me if I'm missing anything. Does
20 that mean that somebody from the clinic contacted you by
21 radio?

22 A Yes.

23 Q You have a radio on you?

24 A Yes.

25 Q Okay. And so when that happened that somebody

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1 told you that -- that there was a -- what'd you call it?

2 An exam completed? How'd you word it?

3 A An inmate complete in the clinic.

4 Q An inmate completed?

5 A Uh-huh.

6 Q In clinic?

7 A Yes.

8 Q What did you do then?

9 A I went to 13 to pick up Ms. Spray.

10 Q What did you observe of Ms. Spray at that time?

11 A She looked really pale and weak. Like, you
12 could tell she didn't feel well.

13 Q Did you talk to her?

14 A Yes. I asked her what did medical say or what
15 did they do to help you?

16 Q Okay. What did she tell you?

17 A I can't remember verbatim.

18 Q I'm not going to ask you verbatim. Did she
19 tell you anything about how she felt?

20 A She never complained, but she was happy that
21 she was taken to the clinic.

22 Q When you say she -- I think you said she was
23 pale and didn't look good.

24 A Yes.

25 Q I understand the word "pale." Is there

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1 anything else that made you think that she didn't look
2 good about her physical appearance?

3 A She just seemed really weak at that time.

4 Q Was she able to walk on her own, or did you
5 help her?

6 A I -- I can't remember exactly. I -- I could
7 have, like, held her arm or something. But I know she
8 could get around at that point in time. She was able to
9 walk on her own. I would go -- I can't remember if I
10 assisted her or not.

11 Q Were you the person that opened the cell for
12 the med pass later that day around noontime?

13 A Yes.

14 Q And we'll get to that in a minute. I think in
15 your report you said that she slid down the door or the
16 side of the door.

17 A Yeah. She kind of, like, scooted out the cell
18 to get her meds.

19 (Plaintiff's Exhibit 6 has been
20 marked for identification purposes
21 and made a part of the record.)

22 Q (BY MR. SHADID) I'm going to hand you what
23 we've marked as Exhibit 6. I think you'll recognize that
24 as being a report you filled out. Please take your time
25 to review it, if you want to. Have you had a chance to

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1 A Yes.

2 Q When you opened the cell, at that time, was
3 there anybody else in the cell with her? To your -- to
4 your best memory.

5 A Okay. I'm not sure at that time, but I do know
6 at some point during that day, there was somebody else.

7 Q I believe that's correct. I'm asking your
8 memory at that time. Again, it's not a trick question.
9 We know what time the other cellmate came in later in the
10 day. But I'm asking if somebody was still there with her
11 that morning.

12 A I don't believe so.

13 Q Prior to the morning of December 16th when you
14 brought Sindi Spray back from medical, had you ever had
15 any interaction with her before?

16 A No.

17 Q Had you conducted a sight check on her cell
18 previously?

19 A Yes.

20 Q You think you had?

21 A Yes.

22 Q But not any direct interaction with her?

23 A No. Not that I can recall.

24 Q When you brought her back that morning,
25 December 16th, when you got her to the cell, you opened

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1 the door, I assume?

2 A Yes.

3 Q Is she in handcuffs?

4 A No.

5 Q When you opened the door, did you assist her
6 into the cell?

7 A I believe at that time she was getting around
8 easily.

9 Q Did she voice any medical complaints to you?
10 By that, I mean anything about how she felt.

11 A No.

12 Q Okay. When is the next time that you had any
13 direct interaction with Sindi Spray?

14 A Med pass.

15 Q I think we have it noted in some of the records
16 that was in the twelve o'clock hour?

17 A Yes.

18 Q And we'll get to the specific times, but --
19 between the time that you brought her down from the
20 clinic until the time that you saw her, say, in the noon
21 hour for the med pass, did you see her at all in between?

22 A It would have just -- it would have just been
23 sight checks.

24 Q Were you involved when the cellmate known as
25 Kim Darling entered that cell?

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1 A I'm not a hundred percent sure.

2 Q Separate from the name, do you think that you
3 put anybody else in that cell yourself that day, or would
4 somebody else have?

5 A I can't recall specifically.

6 Q Okay. Did you ever have any interaction with
7 the inmate named Kim Darling, the cellmate that entered 6
8 Charlie 16 later that morning?

9 A Not that I'm aware of.

10 Q When med pass was happening during the noon
11 hour, you've mentioned it; we've talked about it just for
12 a few minutes here, but now I'd like to be very specific.
13 First, did you know the person who was handing out the
14 meds?

15 A I just knew her name.

16 Q That's -- do you know the name?

17 A Yes.

18 Q What name are you thinking?

19 A Ginger Vann.

20 Q And then was this a regular type of thing for
21 Ginger Vann to do?

22 A Yes.

23 Q You had done it with her before?

24 A Yes.

25 Q When you got to 6 Charlie 16, I take it you

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1 opened the door?

2 A Yes.

3 Q Then what happened? Step by step.

4 A She scooted out the cell to get her meds.

5 Q Scooted out?

6 A Yes.

7 Q Please tell me what that means.

8 A Like, she was --

9 Q Just tell me what you saw.

10 A She was sitting down and she was scooting
11 across the floor.

12 Q She was sitting on the floor?

13 A Yes.

14 Q Did she scoot outside of the door?

15 A Yes.

16 Q Was she on the floor when meds were given to
17 her?

18 A Yes.

19 Q How were the meds handed to her? How's it
20 normally done? Just here or is it a cup or what?

21 A Yeah, a cup.

22 Q Do you know what the meds were?

23 A No, I don't.

24 Q Would you have known at the time, or is that
25 something that would be communicated to you?

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